

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SHELLY STIVERS, on behalf of herself and  
all other similarly situated persons, known  
and unknown,

Plaintiff,

v.

ILLINOIS STATE TOLL HIGHWAY  
AUTHORITY,

Defendant.

No. 15-cv-09030

Judge Matthew F. Kennelly  
Magistrate Judge Maria Valdez

**PLAINTIFF’S AGREED MOTION FOR  
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiff, Shelly Stivers, individually and as representative of a Settlement Class of similarly situated persons, by counsel, Siegel & Dolan Ltd. respectfully requests that this Court approve the parties’ class action settlement, as it meets all of the necessary requirements. In support of her agreed motion, Plaintiff submits a Memorandum of Law, and further states:

1. On behalf of herself and all other past and present similarly situated employees of the Illinois State Toll Highway Authority (“ISTHA”), Plaintiff filed a claim for unpaid overtime wages pursuant to the Illinois Minimum Wage Law, 820 Ill. Comp. Stat. 105/1, *et seq.* (“IMWL”), and the federal Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.* (“FLSA”).
2. The Court granted preliminary approval of the proposed class action settlement on September 14, 2016 (D.E. 57), and approved the sending of the Parties’ revised class action notice on October 5, 2016 (D.E. 59).
3. As set forth in Plaintiff’s accompanying Memorandum of Law, the class settlement is fair, reasonable, and adequate.

4. Attached as Exhibit 1 is Plaintiff's proposed "Order Granting Final Approval of Class Settlement."

WHEREFORE, Plaintiff respectfully requests that this Honorable Court grant final approval of this proposed settlement.

Dated: January 13, 2017

Respectfully submitted,

Bradley Manewith, #6280535  
Marc J. Siegel, #6238100  
Anne K. Schmidlin, #6313916  
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150 North Wacker Drive, Suite 1100  
Chicago, IL 60606  
Tel. (312) 878-3210  
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SHELLY STIVERS, on behalf of herself and all  
other similarly situated persons, known and  
unknown,

By: /s/ Bradley Manewith  
Attorney for Plaintiff

### **CERTIFICATE OF SERVICE**

The undersigned, an attorney, certifies that he served a copy of the attached document, **Plaintiff's Agreed Motion for Final Approval of Class Action Settlement**, to the individuals listed below by electronically filing the same with the Clerk of the U.S. District Court of the Northern District of Illinois on January 13, 2017:

William R. Pokorny  
Sally J. Scott  
Franczek Radelet P.C.  
300 South Wacker Drive, Suite 3400  
Chicago, IL 60606

/s/ Bradley Manewith  
Attorney for Plaintiff